

JAMES R. LAWRENCE, III (admitted *pro hac vice*)
jlawrence@envisage.law

ENVISAGE LAW
2601 Oberlin Road, Suite 100
Raleigh, North Carolina 27608
Phone: 919.755.1317
Facsimile: 919.782.0452

SEAN P. GATES (SBN 186247)
sgates@charislex.com

CHARIS LEX P.C.
225 S. Lake Ave., Ste. 300
Pasadena, CA 91101
Phone: 626.508.1715
Facsimile: 626.508.1730

*Attorneys for Plaintiffs Minds, Inc.,
Tim Pool, The Babylon Bee LLC,
National Religious Broadcasters*

MICHAEL P. FARRIS (admitted *pro hac vice*)
mfarris@nrb.com

NATIONAL RELIGIOUS BROADCASTERS
600 N. Capitol Street, N.W., Suite 210
Washington, DC 20001
Phone: 202.543.0073
Facsimile: 202.543.2649

Attorney for Plaintiff National Religious Broadcasters

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

**MINDS, INC., TIM POOL, THE
BABYLON BEE LLC, and
NATIONAL RELIGIOUS
BROADCASTERS,**

Plaintiffs,

v.

**ROBERT A. BONTA, Attorney
General of California, in his official
capacity,**

Defendant.

Case No.: 2:23-cv-02705-RGK-MAA

**JOINT STIPULATION AND
[PROPOSED] ORDER TO
CONTINUE SCHEDULING
CONFERENCE**

1 The parties stipulate and agree as follows:

2 WHEREAS the initial scheduling conference and defendant's motion to dismiss
3 were scheduled to be heard on the same day, June 26, 2023;

4 WHEREAS the Court recently continued the hearing on defendant's motion to
5 dismiss to July 10, 2023, but did not continue the scheduling conference (Dkt. 31);

6 WHEREAS lead counsel for plaintiffs is located out of state and will need to make
7 separate trips to attend the hearings;

8 WHEREAS lead counsel for defendant is located in the San Francisco Bay Area
9 and will also need to make separate trips to attend the hearings;

10 WHEREAS continuing the scheduling conference to July 10, 2023 would save the
11 parties significant travel time and expense;

12 WHEREAS the parties agree that, given the nature of the claims at issue, holding
13 the scheduling conference and the hearing on defendant's motion to dismiss on the same
14 day would not prejudice any party, and would be most efficient for the parties and the
15 Court;

16 THEREFORE, subject to Court approval, the parties stipulate to continue the
17 scheduling conference set for June 26, 2023 to July 10, 2023.

18
19 Dated: June 20, 2023

ENVISAGE LAW
CHARIS LEX

20
21 By: /s/ James R. Lawrence
22 James R. Lawrence, III

23 Attorneys for Plaintiffs Minds, Inc.,
24 Tim Pool, The Babylon Bee LLC, and
25 National Religious Broadcasters
26
27
28

1 Dated: June 20, 2023

ROB BONTA
Attorney General of California
PAUL STEIN
Supervising Deputy Attorney General

4 By: /s/ Sharon L. O'Grady
5 SHARON L. O'GRADY
6 Deputy Attorney General

7 Attorneys for Defendant Rob Bonta,
8 in his official capacity as Attorney
9 General of California

10 **Attestation**

11 I attest that all signatories listed above, and on whose behalf the filing is submitted,
12 concur in the filing's content and have authorized the filing.

13
14 /s/ Sean P. Gates
15 Sean P. Gates
16
17
18
19
20
21
22
23
24
25
26
27
28